

Henry G. Wykowski (State Bar No. 068255)
HENRY G. WYKOWSKI & ASSOCIATES
235 Montgomery Street, Suite 657
San Francisco, CA 94104
Telephone: (415) 788-4545
Facsimile: (415) 788-4546

Attorneys for Respondent
GRASS ROOTS NONPROFIT COLLECTIVE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Petitioner,

v.

GRASS ROOTS NONPROFIT
COLLECTIVE INC.,

Respondent .

No. CV 13 5780 SC

**STIPULATION AND ~~PROPOSED~~
ORDER RESCHEDULING HEARING ON
ORDER TO SHOW CAUSE AS TO WHY
SUMMONS SHOULD NOT BE ENFORCED
AND EXTENDING DEADLINE FOR
RESPONDENT TO RESPOND**

**Petition Filed: December 13, 2013
The Honorable Samuel Conti**

1. WHEREAS, this Court previously ordered that Respondent Grass Roots Nonprofit Collective, Inc. file a written response to the Court's Order to Show Cause by January 31, 2014.

2. WHEREAS, this Court previously ordered that a hearing on the Order to Show Cause be held on February 21, 2014 at 10:00 A.M.

3. WHEREAS, counsel for Respondent was already committed to be out of the county on business on February 21st.

4. WHEREAS, counsel for Petitioner and counsel for Respondent are presently

1 negotiating a resolution to this petition that may eliminate the need for the Court to issue a ruling,
2 the parties have agreed to continue the presently pending deadline and hearing date.

3 THE PARTIES HEREBY STIPULATE AS FOLLOWS:

- 4
5 1. The time for Respondent to respond to the Order to Show Cause is hereby continued to
6 March 3rd, 2014, and the hearing on the Order to show cause is hereby continued to March
7 21st, at a time convenient for the court.

8
9 /s/ Thomas Moore
10 THOMAS MOORE
11 Assistant United States Attorney
12 Tax Division
13 *Counsel for Petitioner*

14 /s/ Henry Wykowski
15 HENRY WYKOWSKI
16 *Counsel for Respondent*

17 ~~[PROPOSED]~~ ORDER

18 GOOD CAUSE APPEARING, and in the interests of justice, it is hereby ordered that the
19 deadline for Respondent to file a response to the Order to Show Cause is hereby continued to
20 March 3, 2014, and the hearing on the Order to Show Cause is hereby continued and shall be held
21 on March 21st (_____) at 10:00 a.m. .

22 SO ORDERED

23
24 02/05/2014

25 DATE

